

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNIVERSAL MUSIC GmbH d/b/a BRAVADO,

Plaintiff,

v.

The Individuals, Corporations, Limited Liability
Companies, Partnerships and Unincorporated
Associations Identified on Schedule A Hereto,

Defendants.

Case No. 1:20-cv-4157

Judge Gary S. Feinerman

**UNOPPOSED MOTION FOR 30 DAY EXTENSION OF TIME
TO ANSWER OR OTHERWISE PLEAD**

Defendant D-Market Elektronik Hizmetler ve Ticaret Anonim Şirketi (“D-Market” or “Defendant”), a joint stock company organized under the laws of Turkey, listed as Defendant 122 hepsiburada on Schedule A of the Amended Complaint, by and through its attorneys, hereby requests a 30 day extension of time, until October 16, 2020, to Answer or otherwise plead in response to the Amended Complaint and to comply with the Court’s requirement to serve upon Plaintiff Universal Music GmbH d/b/a Bravado (“Bravado” or “Plaintiff”) a written report pursuant to Paragraph 2 of the Preliminary Injunction Order, docket number 37. D-Market and its counsel, which has just been engaged, is investigating the subject matter of the Amended Complaint. This is the first extension request. D-Market’s counsel Jennifer J. Theis has spoken with Plaintiff’s counsel Michael Hierl today, and Mr. Hierl has provided his client’s consent to this unopposed Motion.

Respectfully Submitted,

D-Market Elektronik Hizmetler ve Ticaret Anonim
Şirketi

Date: September 16, 2020

By: /Jennifer J. Theis/

Jeffery A. Handelman

Jennifer J. Theis

Brinks Gilson & Lione

455 N. Cityfront Plaza Drive

NBC Tower – Suite 3600

Chicago, Illinois 60611

(312) 321-4200

Attorneys for Defendant D-Market Elektronik
Hizmetler ve Ticaret Anonim Şirketi

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing **Unopposed Motion for 30 Day Extension of Time To Answer or Otherwise Plead** was filed electronically with the Clerk of the Court using the CM/ECF system on September 16, 2020, which will send notification of such filing to all counsel of record.

Date: September 16, 2020

/s/ Jennifer J. Theis

One of the Attorneys for Defendant D-Market
Elektronik Hizmetler ve Ticaret Anonim Şirketi